

Message

From: Bauer, Jeff [Bauer.Jeff@epa.gov]
Sent: 7/21/2021 3:16:37 PM
To: Rugen, P. (Pamela) [pamela.rugen@nouryon.com]; Lloyd, Tyler [Lloyd.Tyler@epa.gov]
CC: Master, Barbora [Master.Barbora@epa.gov]; Bauer, Jeff [Bauer.Jeff@epa.gov]
Subject: RE: PMN Status Report

Pam,

I have not received the Human Health report with the new information submitted in March. I will ask my Team Leader, Tyler Lloyd to inquire on a projected timeframe.

Recap:

We are still waiting on the update Human Health report, As I mentioned there are going to be conditions in the Consent Order. The water trigger of 1 ppb, Hazard communication, no worker inhalation exposures, worker protection (impervious gloves). Once I get the Human health report I can finalize what will be proposed in the Consent Order. Since there were gen pop risk in the Original assessment (and not sure if that has been mitigated) then we will explore if that needs to be addressed in the Consent Order as well. The water trigger of 1 ppb will address the drinking water and ground water risks. The fugitive air release may still be an issue and an option is to hold to no fugitive air releases during Manufacturing and you can let me know if that is possible. However that release was updated based on the March information.

Thanks
Jeff

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Program (7405M)
<http://www.epa.gov/oppt/newchems/>

EPA East Building, room 4133M
1201 Constitution Ave., NW
Washington, DC 20004
Phone: 202-564-9042, Fax: 202-564-9490

From: Rugen, P. (Pamela) <pamela.rugen@nouryon.com>
Sent: Wednesday, July 21, 2021 10:27 AM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>; Master, Barbora <Master.Barbora@epa.gov>
Subject: FW: PMN Status Report

Hi Jeff/Barbora,
I have a meeting with the business tomorrow and wondered if there is any movement on the human health report?
Thank you in advance for your insight.
Pam

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Pam, We are still waiting on the update Human Health report, As I mentioned there are going to be conditions in the Consent Order. The water trigger of 1 ppb, Hazard communication, no inhalation exposures, worker protection

(impervious gloves). Once I get the Human health report I can finalize what will be proposed in the Consent Order. Since there were gen pop risk in the Original assessment (and not sure if that has been mitigated) then we will explore if that needs to be addressed in the Consent Order as well. The water trigger of 1 ppb will address the drinking water and ground water and possibly the ground water risks. The fugitive air release may still be an issue and an option is to hold to no fugitive air releases during Manufacturing and you can let me know if that is possible.

I have attached the boiler plate Consent Order for you to review. I did not check to see if you are the technical contact on other company PMNs. Review this boilerplate and reference the section mentioned above. There will be PUI testing but that is not required but only suggested. The Consent Order will be followed up with a 5(e) SNUR and that section would be applicable once the Consent Order is implemented.

The template for the Consent Order is also on our Web page.

[New Chemicals Program - Boilerplates for Orders under section 5 of TSCA | Reviewing New Chemicals under the Toxic Substances Control Act \(TSCA\) | US EPA](#)

Thanks
Jeff.

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
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From: Rugen, P. (Pamela) <pamela.rugen@nouryon.com>
Sent: Monday, June 21, 2021 12:28 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>; Master, Barbora <Master.Barbora@epa.gov>
Subject: FW: PMN Status Report

Hello Jeff/Barbora,
Could you please give me an update as I need to inform this business if this is moving forward as they need to plan marketing for this product and are wondering when the EPA review will be finalized?
Thank you,
Pam

From: Rugen, P. (Pamela) <pamela.rugen@nouryon.com>
Sent: Friday, June 11, 2021 11:56 AM
To: bauer.jeff@epa.gov; master.barbora@epa.gov
Cc: Elsik, K. (Kristi) <Kristi.Elsik@nouryon.com>
Subject: FW: PMN Status Report

Hello Jeff/Barbora,
I am wondering if the Human Health report has been completed and if there is any possible timetable that you could give me concerning the completion of the EPA review process.
Thank you in advance and have a nice weekend.
Pam

From: Rugen, P. (Pamela) <pamela.rugen@nouryon.com>
Sent: Thursday, May 27, 2021 10:31 AM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: master.barbora@epa.gov
Subject: RE: PMN Status Report

Hi Jeff/Barbora,

I hope this finds you both well. I recently attended a TSCA New Chemical Consortium and many members discussed that their PMNs are hung up on receiving a Human Health review. This seems to also be the case with this PMN. Do either of you have any insight when this report will be moving ahead as it has been months. There is absolutely no water release so I am curious why this would be in a Consent Order. Please elaborate if you can.

Thank you in advance for any awareness that either of you may have.

Pam

From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Thursday, May 13, 2021 3:31 PM
To: Rugen, P. (Pamela) <pamela.rugen@nouryon.com>; Master, Barbora <Master.Barbora@epa.gov>
Cc: Bauer, Jeff <Bauer.Jeff@epa.gov>
Subject: RE: PMN Status Report

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Pam,

The engineering and exposure reports have been updated with the information you provided on March 1, 2021 in CDX. I am waiting on the Human Health report to see if we mitigated the general population risk from fugitive air releases during manufacturing which is not in line with the release you have in the PMN.

The reports no longer have water releases based on the new information and the Consent Order will have a water trigger of 1 ppb. The Consent Order will have worker protection section for impervious gloves. The Consent Order will have a Hazard communication section for several of the endpoints in the Human Health report (acute toxicity, skin irritation, serious eye damage, eye irritation, and Specific target organ toxicity). The proposed Consent Order will have language to not modify the manufacture, process or use operations that results in worker inhalation.

If the report reflects that the gen pop risk from fugitive air is mitigated then I can move forward with my report then writing the Consent Order. Once I get the report I can discuss the conditions considered for the Consent Order. I currently do not have a time frame for when the report will be completed.

I hope this summary helps you as to what we are waiting on and what the path forward.

Thanks
Jeff

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
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From: Rugen, P. (Pamela) <pamela.rugen@nouryon.com>
Sent: Thursday, May 13, 2021 3:47 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>; Master, Barbora <Master.Barbora@epa.gov>
Subject: PMN Status Report

Hello Jeff/Barbora,
Could you please give me an update on the PMN being reviewed by EPA?
Thank you,
Pam

Pamela Rugen
Senior Product Regulatory Specialist
Americas Product Safety & Regulatory Affairs
Nouryon Chemicals

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We've updated our brand color!

As of May 2021, Nouryon's brand is blue, complementing our focus on science, innovation and sustainability.



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